

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 E. 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

September 13, 2018

Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: Request for Discovery extension
Cruz Sanchez et al v. Rainbow Umbrella, LLC et al; 17-cv-9065-PGG

Your Honor:

Our firm represents Plaintiffs in the above-referenced matter. I write to request a 30 day discovery extension from the current deadline of September 24, 2018 to October 24, 2018. The request is being made because Plaintiffs recently file an amend complaint on August 17, 2018 and the parties agreed to attend mediation (a date has not yet been set). Thus, due to Plaintiffs' recent filing of the amended complaint and upcoming meditation, Plaintiffs respectfully request a short extension of the discovery deadline to October 24, 2018. Defendants consent to the request.

Respectfully Submitted,

/s/ Gennadiy Naydenskiy

Gennadiy Naydenskiy, Esq.
Michael Faillace & Associates
60 East 42nd Street, Suite 2540
New York, New York 10165
Tel: (212) 317-1200
Fax: (212) 317-1620
Email: gnaydenskiy@faillacelaw.com
Attorneys for Plaintiffs